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7 Attorney for Miguel Antonio Murillo-Ramos

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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 MIGUEL ANTONIO MURILLO-RAMOS,

15 Defendant.

Case No. 2:17-cr-00375-JAD-NJK

**STIPULATION TO CONTINUE  
PRELIMINARY HEARING**  
(First Request)

16  
17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.  
18 Trutanich, United States Attorney, and Kimberly M. Frayn, Assistant United States Attorney,  
19 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,  
20 and Kathryn C. Newman, Assistant Federal Public Defender, counsel for Miguel Antonio  
21 Murillo-Ramos, that the Preliminary Hearing currently scheduled on June 15, 2020, be vacated  
22 and continued to a date and time convenient to the Court, but no sooner than seven (7) days.

23 This Stipulation is entered into for the following reasons:

24 1. Counsel for the defendant needs to consult with the client and continue our  
25 investigation.  
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2. Defendant is incarcerated, having been detained in this matter and in *United States v. Miguel Murillo-Ramos*, No. 2:20-cr-114-JCM-NJK, and is subject to an ICE detainer.

3. Under Federal Rule of Criminal Procedure 5.1(c), the Court “must hold the preliminary hearing within a reasonable time, but no later than 14 days after the initial appearance if the defendant is in custody . . . .” However, under Rule 5.1(d), “[w]ith the defendant’s consent and upon a showing of good cause—taking into account the public interest in the prompt disposition of criminal cases—a magistrate judge may extend the time limits in Rule 5.1(c) one or more times . . . .”

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

This is the first request for continuance filed herein.

DATED this 12th day of June, 2020.

RENE L. VALLADARES  
Federal Public Defender

NICHOLAS A. TRUTANICH  
United States Attorney

/s/ Kathryn C. Newman  
By \_\_\_\_\_

/s/ Kimberly M. Frayn  
By \_\_\_\_\_

KATHRYN C. NEWMAN  
Assistant Federal Public Defender

KIMBERLY M. FRAYN  
Assistant United States Attorney

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MIGUEL ANTONIO MURILLO-RAMOS,

Defendant.

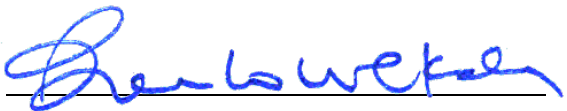
Case No. 2:17-cr-00375-JAD-NJK

**ORDER**

Based on the Stipulation of counsel and good cause appearing,

IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on June 15, 2020 at the hour of 1:00 p.m., be vacated and continued to June 22, 2020 at the hour of 2:00 p.m.

DATED this 15th day of June, 2020.



UNITED STATES MAGISTRATE JUDGE